

IN THE UNITED STATES DISTRICT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

VS.

DONALD HAVEY,

Defendant.

Case No. 4:15CR00483 JAR

DEFENDANT'S MOTION TO CONTINUE SENTENCING

Comes now Defendant Donald Havey, by and through counsel Paul J. D'Agrosa and hereby requests this Court enter an order continuing sentencing in the above cause for thirty (30) days. In support thereof, counsel states as follows:

1. Defendant waived indictment and entered a plea of guilty to an Information on October 22, 2015. Sentencing is currently scheduled for January 26, 2016.
2. Defendant is on bond and has been fully compliant with his conditions of release.
3. Counsel requires additional time to complete a sentencing memorandum and his objections to the presentence investigation report.
4. The government has no objection.
5. Counsel's schedule towards the end of 2015 prevented him from finishing the work necessary to adequately prepare for a January sentencing date.

WHEREFORE, for the foregoing reasons Defendant through counsel requests this Court enter an order continuing sentencing in this matter for thirty (30) days from January 26, 2016.

Respectfully submitted,

LAW OFFICES OF
WOLFF & D'AGROSA

/s/ Paul J. D'Agrosa (36966MO)
Paul J. D'Agrosa
7710 Carondelet, Suite 200
Clayton, Mo. 63105
(314) 725-8019
(314) 725-8443 FAX
Paul@wolffdagrosa.com

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of January, 2016, the foregoing was filed electronically with the Clerk of the Court to be served by operation of the Court's electronic filing system upon the following: Ms. Dorothy McMurtry, Assistant U.S. Attorney.

/s/Paul J. D'Agrosa